

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

Michael Lightle,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 1:20-cv-3217
)	
Krisor & Associates,)	
)	
Defendant.)	

COMPLAINT

Jurisdiction

1. This is an action for actual and statutory damages, legal fees and costs under 15 U.S.C. § 1692. This Court has jurisdiction under 28 U.S.C. § 1331 and under 15 U.S.C. § 1692k(d).

Venue

2. The acts and transactions alleged occurred in this Judicial District, Plaintiff resides in this Judicial District, and Defendant transacts business in this Judicial District.

Parties

3. The Plaintiff, Michael Lightle, is a person and a “consumer.”
4. The Defendant, Krisor & Associates, (hereinafter referred to as “Defendant”), is a collection law firm and debt collection agency at 16801 Cleveland Rd, Granger, IN 46530. Defendant regularly collects consumer debts.

Factual Allegations

5. The Defendant is a debt collection agency.

6. The Plaintiff incurred a consumer debt that went into default, and Defendant was hired to collect it.
7. The Defendant employed collectors and representatives to collect the debt, and Defendant acted through its collectors and representatives.
8. Plaintiff financed an automobile purchase through Tidewater Finance Company before March 9, 2020, but the vehicle was repossessed, and Defendant received the account for collection.
9. On March 9, 2020, Defendant sent a notice to Plaintiff's lawyer to collect Plaintiff's former automobile loan, but Plaintiff did not owe the debt. Accordingly, Defendant violated the FDCPA.

Violation of the FDCPA

10. Defendant violated 15 U.S.C. 1692 et seq, and 1692(d), (e), and (f).
11. Defendant is liable for actual and statutory damages, attorney fees and costs.

Prayer for Relief

WHEREFORE, Plaintiff requests that the Court find that Defendant violated the FDCPA and award him actual and statutory damages, attorney fees and costs, and all other relief Plaintiff is due.

/s/ Andrew Ault
Andrew Ault 27011-41
Ault Law Office
Attorney for Plaintiff
5214 S. East Street, Suite D2
Indianapolis, IN 46227
Office: (317) 626-9994
Email: andrewaultlaw@gmail.com